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December 6, 2023

Via ECF

Hon. Paul G. Gardephe  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 705  
New York, NY 10007

Re: *Helayne Seidman v. Valnet Inc.*  
Case No: 1:23-cv-06929-PGG

Dear Judge Gardephe:

We are the attorneys for Plaintiff Helayne Seidman ("Plaintiff") in this matter. Earlier today, Plaintiff submitted a consent letter motion (ECF No. 19) informing the Court that the parties reached a settlement in principle and requesting a discontinuance without prejudice. Upon notice from the Court that Your Honor does not allow orders of dismissal without prejudice, the parties submit this letter to clarify and amend their request to a thirty (30) day adjournment of the Initial Conference set for tomorrow, December 7, 2023 at 10:00 AM, to allow the parties time to finalize the terms of their agreement. Once the agreement and obligations thereunder are finalized, the parties will thereafter submit a dismissal with prejudice.

Defendant consents to this request, and we thank the Court for its time and consideration.

Respectfully submitted,

/s/ Renee J. Aragona  
Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.  
Mitchell Silberberg & Knupp LLP  
Via email to [lre@msk.com](mailto:lre@msk.com)

*Counsel for Defendant*

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe  
Paul G. Gardephe, U.S.D.J.

Dated: Dec. 6, 2023

*The conference is  
adjourned to January 9, 2024  
at 11:30 a.m.*